

## **Exhibit 78**

# **SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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11 *Attorneys for Plaintiff* (additional  
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13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 **IN RE: SOCIAL MEDIA**  
16 **ADOLESCENT**  
17 **ADDICTION/PERSONAL INJURY**  
18 **PRODUCTS LIABILITY LITIGATION,**

19 **THIS DOCUMENT RELATES TO:**

20 Tucson Unified School District v. Meta  
21 Platforms Inc., et al.

22 Case No.: 4:24-CV-01382

Case No. 4:22-MD-03047-YGR

MDL No. 3047

**PLAINTIFF'S SECOND AMENDED  
ANSWERS TO DEFENDANTS'  
INTERROGATORIES  
TO TUCSON UNIFIED SCHOOL  
DISTRICT (SET 3)**

PROPOUNDING PARTY: **DEFENDANTS**

RESPONDING PARTY: **TUCSON UNIFIED SCHOOL DISTRICT**

SET: **THREE (3)**

DATE OF SERVICE: **May 15, 2025**

Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of this judicial district, Tucson Unified School District (“Plaintiff”), hereby provides these amended responses and objections to Defendants’ Interrogatories to Tucson Unified School District (Set 3) (the “Request” or “Requests”).

### **PRELIMINARY STATEMENT**

Plaintiff has undertaken a reasonable effort to provide the information requested by these Interrogatories to the extent the requested information is not subject to objection. Plaintiff’s investigation of the facts relating to this Action and fact discovery generally are ongoing and additional information may be obtained that may alter these responses. The following responses and objections are based upon information that has been collected and reviewed to date for the purpose of these Interrogatories and are not prepared from any personal knowledge of any single individual. Accordingly, all the following responses are given without prejudice to, and with the express reservation of, Plaintiff’s right to supplement or modify its responses and objections to address additional information, and to rely upon any and all such information and documents at trial or otherwise.

### **OBJECTIONS TO DEFINITIONS**

The following applies to each Interrogatory.

1. Plaintiff objects to Defendants’ definition of “Alleged Harm” on the grounds that it calls for a legal conclusion or Expert Opinion. Further, as discovery is ongoing, and the factual record is not yet complete, additional injury and harm may occur and Plaintiff may need to supplement any responses to account for additional facts learned during fact or expert discovery.

2. Plaintiff objects to Defendants’ definition of “Plaintiff,” “You,” and “Your,” as overly broad, unduly burdensome, and seeking the production of information that is not relevant to the claims or defenses of any party, not proportional to the needs of the case, and not reasonably

1 accessible to Plaintiff upon reasonable diligence. Furthermore, the definition of these terms is over  
 2 broad to the extent it would require Plaintiff to respond to these Interrogatories for people  
 3 “purporting to act on its behalf” and to the extent it purports to include any of the persons identified  
 4 in their personal capacities rather than as officers and employees of Plaintiff. Plaintiff objects  
 5 further to this definition as seeking Privileged Information because the definition includes  
 6 Plaintiff’s attorneys.

7 3. Plaintiff’s answers are made without waiving its right to object on the grounds of  
 8 relevance, hearsay, materiality, competency, or any other ground to the use of its responses in any  
 9 subsequent stage or proceeding in this action or any other action.

10 4. If Plaintiff, in response to any Interrogatory, inadvertently produces information that  
 11 is or could be the subject of the objections stated herein, such production is not intended to be, nor  
 12 is it deemed to be, a waiver of the objections with respect to such information provided or withheld.

### 13 **RESPONSES TO INTERROGATORIES**

#### 14 **INTERROGATORY NO. 5:**

15 For each category of damages for which You are seeking damages in this Action, including  
 16 each category (e.g., “Past human and financial resources estimated to have been expended in  
 17 connection with the harms alleged in Complaint,” “Costs associated with the harms alleged in the  
 18 complaint for expenditures on external programs and services,” “Costs associated with incidents of  
 19 damage to Plaintiff’s property in connection with the harms alleged in the Complaint”) and each  
 20 subcategory (e.g., “expending, diverting, and increasing personnel to provide mental health services  
 21 to students”; “expending, diverting, and increasing staff time to confiscate cell phones and other  
 22 devices”; “expending, diverting, and increasing resources to purchase tools necessary to prevent or  
 23 limit student’s access to social media”; “expending, diverting, and increasing resources to develop  
 24 new and revised teaching plans to address students’ declining achievement”; etc.) You listed in  
 25 Your response to Question 23 of the Plaintiff Fact Sheet, please (a) describe what the category  
 26 includes, (b) explain how You performed or arrived at Your computation, and (c) identify each cost  
 27 or other input that You used in Your computation.  
 28

**RESPONSE:**

Plaintiff objects to the Interrogatory as premature to the extent it seeks information about subjects of ongoing discovery, including expert discovery. Plaintiff's investigation is ongoing and the factual record is therefore incomplete. Expert discovery is also incomplete. Plaintiff further objects to Interrogatory No. 5 as duplicative of information Plaintiff already provided in its supplemental initial disclosures served pursuant to Fed. R. Civ. P. 26. Additionally, Plaintiff objects to Interrogatory No. 5 because it calls for expert opinion and seeks information that is privileged attorney work product and/or privileged attorney-client communications. Lastly, Plaintiff objects because the Interrogatory is compound, consisting of multiple subparts relating to 1) descriptions of categories and subcategories 2) identifying costs, assumptions, and inputs used in calculations for damages and 3) an explanation of how the damages were calculated.

Subject to and without waiving the foregoing objections, Plaintiff incorporates its Rule 26 disclosures herein. Plaintiff has previously provided a breakdown of the categories and subcategories of damages. Plaintiff is under no obligation to re-create or provide work product to further define categories and subcategories for Defendants. Plaintiff previously produced documents supporting the damages claimed for each category and subcategory of damages through its Rule 26 disclosures. As stated in prior answers, Plaintiff will make appropriate expert disclosures concerning damages categories, subcategories, explanations, assumptions, and inputs sought by this Interrogatory, to the extent such information exists, in accordance with the deadlines set by the Court and the Federal Rules of Civil Procedure.

Plaintiff further states that over the last several years, it has incurred increased costs to combat the issues Defendants have caused throughout the District. Plaintiff listed the following general categories of past compensatory damages in its Second Supplemental Initial Disclosures: 1) past human and financial resources estimated to have been expended in connection with the harms alleged in Complaint, 2) costs associated with the harms alleged in the Complaint for expenditures on external programs and services, and 3) costs associated with incidents of damage to Plaintiff's property in connection with the harms alleged in the Complaint.

1 Category 1 includes previously disclosed types of damages, such as expending and diverting  
2 financial and personnel resources to address the disruption and other impacts caused by  
3 Defendants' conduct, including to confiscate cell phones and other devices; respond to increased  
4 mental and behavioral health issues among students; communicate and engage with parents and  
5 guardians; investigate and respond to threats to schools and students; develop and revise teaching  
6 plans; provide additional learning support; address student disciplinary issues; modify mental  
7 health curricula; create education materials about social media addiction and harm; route students  
8 to counselors and mental health service providers; develop additional mental health resources; train  
9 teachers to support student mental health; train staff to address students' use of Defendants'  
10 platforms and related issues; update student handbooks to address use of Defendants' platforms;  
11 and update school policies to address use of Defendants' platforms.

12 In calculating damages associated with Category 1, Plaintiff identified costs associated with  
13 certain staff, including teachers, assistant principals, principals, and staff providing mental health  
14 and related student support services. A percentage was then applied to each staff category or  
15 position for each respective year to reach an approximate total of this category of damages. This  
16 percentage represents a low-end estimate of Plaintiff's damages. Plaintiff then added the total  
17 amounts across the relevant school years to reach a total. Plaintiff currently estimates this category  
18 of damages at \$97,676,885. *See Exhibit 1.*

19 For Category 2 damages, Plaintiff identified past expenditures it alleges were necessitated  
20 by Defendants' conduct, including for Character Strong SEL Curriculum, Talkspace, Awareity,  
21 School Threat Assessment, Yondr Pouches, and cell phone lockers. Plaintiff currently estimates  
22 this category of damages at \$543,331. *See Exhibit 1.*

23 For Category 3 damages, Plaintiff investigated incidents of property damage Plaintiff has  
24 reason to believe were caused by Defendants' conduct. In addition to the expenses identified,  
25 Plaintiff has expended significant human resources to address these harms. In many instances, no  
26 direct expense is tracked because the damage was remediated by Plaintiff's staff using existing  
27 maintenance inventory or did not require direct expense but, rather, staff time to remediate. In  
28 addition, these incidents prevent Plaintiff from full use and enjoyment of its property. Plaintiff

1 currently estimates this category of damages at \$14,910.64. *See* Plaintiff's Third Amended Answers  
 2 to Defendants' Interrogatories (Set 1).

3 Plaintiff reserves the right to amend and/or supplement its response to the Interrogatory and  
 4 Plaintiff's Rule 26 Disclosures as more information becomes available through discovery,  
 5 including expert discovery.

6  
 7 Dated: May 15, 2025

/s/ Austin Brane

Austin Brane

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27 ***Counsel for Plaintiff***  
 28

**VERIFICATION**

I, Robert Ross declare:

I am the General Counsel for Tucson Unified School District. I am authorized to make this verification on behalf of Plaintiff. The foregoing Plaintiff's Third Amended Responses Interrogatories to Tucson Unified School District (Set 3) represents a corporate response, based on information, in part, assembled by the Plaintiff's employees and/or representatives. Because the matters stated in the document identified above constitute a corporate response, they are not all necessarily within my personal knowledge, or within the personal knowledge of any single individual. Subject to these limitations, the information contained in the foregoing response is, to the best of Plaintiff's knowledge, true and correct. Plaintiff reserves the right to make any changes should it appear that any omissions or errors have been made.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: \_\_\_\_\_

By: \_\_\_\_\_



	SY 16-17	SY 17-18	SY 18-19	SY 19-20	SY 20-21	SY 21-22	SY 22-23	SY 23-24	Total	Weight	Weighted Total
Specialist Counselor	\$ 51,090.00	\$ 50,068.20	\$ 52,456.95	\$ -					\$ 153,615.15	50%	\$ 76,807.58
Social Worker - Master's						\$ 319,551.87			\$ 319,551.87	60%	\$ 191,731.12
Social Worker - Master's						\$ 219,040.87	\$ 1,125,085.94	\$ 866,265.83	\$ 2,210,392.64	60%	\$ 1,326,235.58
Social Worker - LCSW				\$ 1,106,987.90	\$ 894,623.13	\$ 638,130.71	\$ 676,012.66	\$ 654,803.55	\$ 3,970,557.95	80%	\$ 3,176,446.36
Social Worker - Bachelor's							\$ 230,058.60	\$ 208,671.31	\$ 438,729.91	75%	\$ 329,047.43
Social Worker	\$ 1,200,316.92	\$ 1,066,781.30	\$ 1,220,019.28	\$ 472,818.24	\$ 564,863.61				\$ 4,524,799.35	50%	\$ 2,262,399.68
School Psychologist - Hybrid								\$ 124,988.55	\$ 124,988.55	50%	\$ 62,494.28
School Psychologist						\$ 3,446,853.45	\$ 2,872,477.88	\$ 2,733,115.48	\$ 9,052,446.81	50%	\$ 4,526,223.41
School Counseling Intern		\$ 5,083.00	\$ 39,713.28				\$ 80,728.32	\$ 306,794.36	\$ 432,318.96	50%	\$ 216,159.48
Psychology Intern	\$ 68,915.61	\$ 98,407.56					\$ 70,484.93	\$ 40,641.90	\$ 278,450.00	50%	\$ 139,225.00
Psychology Extern								\$ 5,336.73	\$ 5,336.73	50%	\$ 2,668.37
Psychologist	\$ 3,438,963.80	\$ 3,382,323.10	\$ 3,448,280.33	\$ 3,200,356.56	\$ 3,270,891.18				\$ 16,740,814.97	50%	\$ 8,370,407.49
Nurse	\$ 1,417,007.79	\$ 1,545,847.72	\$ 1,898,346.65	\$ 1,803,031.14	\$ 1,487,980.51	\$ 1,545,568.30	\$ 1,715,093.22	\$ 2,287,288.76	\$ 13,700,164.08	8%	\$ 1,096,013.13
Licensed Practical Nurse	\$ 65,330.51	\$ 67,173.60	\$ 70,247.91	\$ 69,776.62	\$ 38,727.04	\$ 80,270.83	\$ 231,651.47	\$ 369,375.27	\$ 992,553.25	8%	\$ 79,404.26
Health Assistant - Itinerant	\$ 60,227.73						\$ 37,438.99	\$ 43,101.18	\$ 140,767.89	8%	\$ 11,261.43
Health Assistant	\$ 2,166,050.32	\$ 1,927,651.86	\$ 2,207,518.14	\$ 2,104,997.01	\$ 1,935,217.18	\$ 2,000,121.96	\$ 2,708,736.26	\$ 2,891,861.61	\$ 17,942,154.33	8%	\$ 1,435,372.35
Ex Ed Intervention Specialist	\$ 62,302.50	\$ 97,112.60	\$ 95,056.00						\$ 254,471.10	80%	\$ 203,576.88
Ex Ed Behavior Intervention Specialist				\$ 83,594.28	\$ 101,070.92	\$ 250,379.48	\$ 118,490.40	\$ 120,043.44	\$ 673,578.52	60%	\$ 404,147.11
Counselor	\$ 3,979,300.74	\$ 4,385,015.95	\$ 4,962,193.87	\$ 5,028,515.18	\$ 5,128,836.60	\$ 4,961,856.60	\$ 5,350,567.73	\$ 5,612,863.31	\$ 39,409,149.98	50%	\$ 19,704,574.99
Counseling Intern	\$ 86,858.63	\$ 10,166.00	\$ 57,413.47	\$ 18,086.07	\$ 39,742.26	\$ 103,342.47			\$ 315,608.90	50%	\$ 157,804.45
Behavior Specialist	\$ 152,165.78	\$ 170,992.03	\$ 187,515.24	\$ 216,941.83	\$ 169,891.44	\$ 339,467.12	\$ 389,549.33	\$ 389,289.73	\$ 2,015,812.50	75%	\$ 1,511,859.37
Behavior Intervention Monitor	\$ 195,872.42	\$ 229,067.63	\$ 211,527.95	\$ 178,831.85	\$ 256,606.47	\$ 201,379.85	\$ 293,654.60	\$ 432,698.80	\$ 1,999,639.57	75%	\$ 1,499,729.68
SEL Director					\$ 91,000.00	\$ 91,000.00	\$ 115,678.37	\$ 118,003.21	\$ 415,681.58	100%	\$ 415,681.58
SEL PD							\$ 60,792.25	\$ 70,197.49	\$ 130,989.74	100%	\$ 130,989.74
MTSS	\$ 1,569,691.34	\$ 1,791,183.93	\$ 2,055,336.47	\$ 2,286,712.51	\$ 2,257,432.68	\$ 2,839,181.09	\$ 4,231,543.04	\$ 4,602,497.21	\$ 21,633,578.25	40%	\$ 8,653,431.30
Restorative Practice Facilitators	\$ -	\$ 308,406.38	\$ 288,222.90	\$ 227,290.48	\$ 355,468.00	\$ 312,628.47	\$ 309,156.94	\$ 403,322.63	\$ 2,204,495.80	50%	\$ 1,102,247.90
									\$ 140,080,648.38		\$ 57,085,939.92

School Year	Position	FTE	Average Salary	Total		Weight		Weighted Total
2023	ES Teachers	915.6	55416.79	\$ 50,739,612.92		1.00%		\$ 507,396.13
2023	MS Teachers	448.7	52703.11	\$ 23,647,885.46		5.00%		\$ 1,182,394.27
2023	HS Teachers	644	\$ 56,187	\$ 36,206,599.93		7.50%		\$ 2,715,494.99
2023	AP ES	9	\$ 70,631	\$ 635,676.12		10.00%		\$ 63,567.61
2023	AP MS	17	\$ 86,149	\$ 1,464,528.75		30.00%		\$ 439,358.63
2023	AP HS	25	\$ 93,244	\$ 2,331,102.75		30.00%		\$ 699,330.83
2023	Principal ES	58	\$ 113,892	\$ 6,605,754.56		5.00%		\$ 330,287.73
2023	Principal MS	18	\$ 115,007	\$ 2,070,132.66		15.00%		\$ 310,519.90
2023	Principal HS	12	\$ 131,427	\$ 1,577,129.76		25.00%		\$ 394,282.44
								<b>\$ 6,642,632.53</b>
2022	ES Teachers	909.4	53090.26	\$ 48,280,282.44		1.00%		\$ 482,802.82
2022	MS Teachers	461.7	48142.03	\$ 22,227,175.25		5.00%		\$ 1,111,358.76
2022	HS Teachers	610	\$ 46,541	\$ 28,404,253.04		7.50%		\$ 2,130,318.98
2022	AP ES	7	\$ 92,229	\$ 645,604.05		10.00%		\$ 64,560.41
2022	AP MS	16	\$ 92,978	\$ 1,487,651.52		20.00%		\$ 297,530.30
2022	AP HS	22	\$ 107,371	\$ 2,362,151.44		30.00%		\$ 708,645.43
2022	Principal ES	53	\$ 111,726	\$ 5,921,460.51		5.00%		\$ 296,073.03
2022	Principal MS	16	\$ 119,538	\$ 1,912,607.36		15.00%		\$ 286,891.10
2022	Principal HS	12	\$ 128,353	\$ 1,540,237.32		25.00%		\$ 385,059.33
								<b>\$ 5,763,240.17</b>
2021	ES Teachers	988.4	52786.24	\$ 52,173,919.62		1.00%		\$ 521,739.20
2021	MS Teachers	516.9	45368.44	\$ 23,450,946.64		5.00%		\$ 1,172,547.33
2021	HS Teachers	627	\$ 44,466	\$ 27,858,049.24		7.50%		\$ 2,089,353.69
2021	AP ES	7	\$ 85,559	\$ 598,910.83		10.00%		\$ 59,891.08
2021	AP MS	15	\$ 85,961	\$ 1,289,416.80		20.00%		\$ 257,883.36
2021	AP HS	24	\$ 99,145	\$ 2,379,471.12		30.00%		\$ 713,841.34
2021	Principal ES	54	\$ 107,580	\$ 5,809,318.38		5.00%		\$ 290,465.92
2021	Principal MS	14	\$ 115,591	\$ 1,618,275.96		15.00%		\$ 242,741.39
2021	Principal HS	12	\$ 118,913	\$ 1,426,953.12		25.00%		\$ 356,738.28
								<b>\$ 5,705,201.59</b>
2020	ES Teachers	1,114.60	53106.07	\$ 59,192,025.62		1.00%		\$ 591,920.26
2020	MS Teachers	512.36	50682.37	\$ 25,967,619.09		3.50%		\$ 908,866.67
2020	HS Teachers	683.11	\$ 49,731	\$ 33,971,695.59		5.00%		\$ 1,698,584.78
2020	AP ES	11	\$ 84,859	\$ 933,454.28		6.00%		\$ 56,007.26
2020	AP MS	9	\$ 88,104	\$ 792,938.52		20.00%		\$ 158,587.70
2020	AP HS	24	\$ 103,172	\$ 2,476,134.24		25.00%		\$ 619,033.56
2020	Principal ES	61	\$ 102,500	\$ 6,252,474.99		3.50%		\$ 218,836.62
2020	Principal MS	8	\$ 114,799	\$ 918,395.20		12.50%		\$ 114,799.40
2020	Principal HS	8	\$ 125,508	\$ 1,004,061.52		20.00%		\$ 200,812.30
								<b>\$ 4,567,448.55</b>
2019	ES Teachers	1072	53106.07	\$ 56,929,707.04		1.00%		\$ 569,297.07
2019	MS Teachers	566.4	50682.37	\$ 28,706,494.37		3.50%		\$ 1,004,727.30
2019	HS Teachers	686	\$ 49,731	\$ 34,120,391.07		5.00%		\$ 1,706,019.55
2019	AP ES	5	\$ 84,859	\$ 424,297.40		2.00%		\$ 8,485.95
2019	AP MS	15	\$ 88,104	\$ 1,321,564.20		15.00%		\$ 198,234.63

2019	AP HS	24	\$	103,172	\$	2,476,134.24		20.00%		\$	495,226.85
2019	Principal ES	57	\$	102,500	\$	5,842,476.63		3.50%		\$	204,486.68
2019	Principal MS	14	\$	114,799	\$	1,607,191.60		12.50%		\$	200,898.95
2019	Principal HS	10	\$	125,508	\$	1,255,076.90		20.00%		\$	251,015.38
										<b>\$</b>	<b>4,638,392.36</b>
2018	ES Teachers	1039.6		52002.38	\$	54,061,674.25		1.00%		\$	540,616.74
2018	MS Teachers	618.6		47785.32	\$	29,559,998.95		3.50%		\$	1,034,599.96
2018	HS Teachers	768	\$	47,705	\$	36,632,354.66		5.00%		\$	1,831,617.73
2018	AP ES	6	\$	82,132	\$	492,793.38		2.00%		\$	9,855.87
2018	AP MS	13	\$	87,770	\$	1,141,003.50		15.00%		\$	171,150.53
2018	AP HS	24	\$	102,625	\$	2,462,989.44		20.00%		\$	492,597.89
2018	Principal ES	52	\$	102,917	\$	5,351,675.68		3.50%		\$	187,308.65
2018	Principal MS	15	\$	109,173	\$	1,637,591.25		12.50%		\$	204,698.91
2018	Principal HS	10	\$	125,760	\$	1,257,599.00		20.00%		\$	251,519.80
										<b>\$</b>	<b>4,723,966.07</b>
2017	ES Teachers	1053.7		48932.04	\$	51,559,690.55		1.00%		\$	515,596.91
2017	MS Teachers	554.2		46874.83	\$	25,978,030.79		3.50%		\$	909,231.08
2017	HS Teachers	681	\$	47,060	\$	32,061,916.68		5.00%		\$	1,603,095.83
2017	AP ES	8	\$	79,866	\$	638,925.76		2.00%		\$	12,778.52
2017	AP MS	12	\$	85,568	\$	1,026,816.00		15.00%		\$	154,022.40
2017	AP HS	23	\$	98,699	\$	2,270,077.00		20.00%		\$	454,015.40
2017	Principal ES	53	\$	102,260	\$	5,419,765.16		3.50%		\$	189,691.78
2017	Principal MS	12	\$	115,137	\$	1,381,646.16		12.50%		\$	172,705.77
2017	Principal HS	11	\$	124,352	\$	1,367,871.12		20.00%		\$	273,574.22
										<b>\$</b>	<b>4,284,711.91</b>
2016	ES Teachers	1562.9		46491.99	\$	72,662,331.17		1.00%		\$	726,623.31
2016	MS Teachers	526		46431.74	\$	24,423,095.24		3.50%		\$	854,808.33
2016	HS Teachers	668	\$	42,595	\$	28,449,354.12		5.00%		\$	1,422,467.71
2016	AP ES	8	\$	68,808	\$	550,465.52		2.00%		\$	11,009.31
2016	AP MS	15	\$	83,332	\$	1,249,974.30		15.00%		\$	187,496.15
2016	AP HS	21	\$	99,547	\$	2,090,480.07		20.00%		\$	418,096.01
2016	Principal ES	50	\$	105,951	\$	5,297,527.50		3.50%		\$	185,413.46
2016	Principal MS	15	\$	107,996	\$	1,619,940.60		12.50%		\$	202,492.58
2016	Principal HS	11	\$	116,793	\$	1,284,726.19		20.00%		\$	256,945.24
										<b>\$</b>	<b>4,265,352.10</b>
										<b>\$</b>	<b>40,590,945.28</b>

<b>Character Strong SEL Curriculum</b>		<b>Weight</b>	
2020	\$ 11,940.00		
2021	\$ 393,365.00		
2022	\$ 135,200.00		
2023	\$ 66,635.00		
	\$ 607,140.00	40%	\$ 242,856.00
<b>Talkspace</b>			
2021	\$ 271,500.00		
2022	\$ 306,055.00		
	\$ 577,555.00	40%	\$ 231,022.00
<b>Awareity</b>			
2019	\$ 13,994.00		
2020	\$ 11,997.00		
2021	\$ 14,497.00		
2022	\$ 14,497.00		
2023	\$ 14,497.00		
2024	\$ 14,497.00		
	\$ 83,979.00	40%	\$ 33,591.60
<b>School Threat Assessment Consulting</b>			
2023	\$ 7,280.00	40%	\$ 2,912.00
<b>Yondr Pouches Rental</b>	\$ 16,850.00	100%	\$ 16,850.00
<b>Cell Phone Lockers</b>	\$ 16,100.00	100%	\$ 16,100.00
			<b>\$ 543,331.60</b>